

BARNEYS CANYON MINE
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David I. Hodson
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DIVISION OF
OIL, GAS & MINING

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MINERALS PROGRAM
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Kennecott

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September 22, 1992

Mr. Lowell P. Braxton
Associate Director
Utah Division of Oil, Gas and Mining
3 Triad Center, Suite 350
Salt Lake City, Utah 84180

Dear Mr. Braxton:

Thank you for your letter of September 8 granting Kennecott conditional tentative approval of the Permit Revision for the Barneys Canyon Mine. Our responses to the conditions of tentative approval are presented herein and are presented in the same sequence and format as were the comments in the September 8 tentative approval letter.

R647-004-107 Operation Practices

107.4 Deleterious Materials

1. Kennecott agrees to address the requirements of the Division of Water Quality (DWQ) for storage and eventual disposal of sulfide ore stockpiles at the Melco and Barneys Canyon mine sites. Kennecott agrees to include the agreements reached with DWQ in the complete updated and consolidated mining and reclamation plan to be completed in the fourth quarter of this year. Appendix C of the revision document will be expanded to include all correspondence with DWQ regarding this matter.
2. Kennecott proposes to adopt the Division's suggestion that the detailed description of the means of handling sulfide waste rock in the event that it is not processed be addressed in the complete updated and consolidated mining and reclamation plan to be completed in the fourth quarter of this year.

R647-004-109 Impact Assessment

109.2 Wildlife Habitat

1. Wildlife mortality and the steps that have been taken to prevent mortality will be described in the full revised plan to be prepared during the final quarter of this year. This information is more appropriate for that consolidation since the current revision deals only with mine and waste rock facilities and not heap leach or process facilities.

R647-004-110 Reclamation Plan

110.2 Roads, highwalls, slopes, etc.

1. Kennecott appreciates the Division's decision to grant a variance from regrading the Melco 7200 and 7300 dumps. Kennecott agrees to re-examine the issue of regrading of the 7200 dump within five years or by the end of mine life at Barneys Canyon, whichever comes first. Kennecott further agrees to regrading the 7200 dump to 2h:1v to the 6850 level if it is determined that Kennecott Bingham Canyon's Dry Fork Creek dumps will intercept the 7200 dump prior to the initiation of reclamation of the 7200 dump outslope.

Kennecott proposes to establish the minimum revegetation standard for the 7300 and 7200 angle of repose dump slopes at Melco by performing vegetation transects of south facing angle of repose fill slopes along the Melco haul road. These slopes were hydroseeded 2 years ago using seed mixtures very similar to those prescribed in the MRP.

Kennecott agrees to commit to apply to the 7300 and 7200 dump south outslopes the currently approved reclamation treatment for the Melco 7200 dump outslope unless, prior to reclamation, Kennecott and DOGM jointly adopt a modified program of revegetation. Kennecott will cooperate fully with DOGM in the evaluation of alternate reclamation techniques for these dump outslopes. If the success of the revegetation efforts on the 7300 dump establishes a higher revegetation standard than agreed to previously, then this higher standard will be applied to the 7200 dump angle of repose dump slopes.

Using the 7300 dump slope experience as a basis, Kennecott will submit to DOGM a plan to achieve the required revegetative standard on the 7200 dump angle of repose slopes. Kennecott may instead elect to regrade the 7200 dump to 2h:1v and hydroseed as outlined in the original plan approval.

Topsoil will not be applied and the 70% revegetation success standard will not apply to the regraded 2h:1v dump.

2. Kennecott will examine techniques that may be implemented for the revegetation of the cut and fill slopes of the Melco haul roads. In general the following are proposed:
 - 1) all road surfaces will be deeply ripped with a dozer/ripper and topsoil will be placed on the road surface in a roughened condition prior to hydroseeding;
 - 2) all road outslopes that have not previously been hydroseeded with some relative degree of success will be roughened to the extent possible using equipment which can safely access the outslopes from existing roadways;
 - 3) the effectiveness of tackifiers will be evaluated for use in seed stabilization on both cut and fill slopes and, if found to be effective, the appropriate tackifier will be used in conjunction with further hydroseeding;
 - 4) a reapplication of the appropriate seed mix will be applied by hydroseeder to all previously hydroseeded cut and fill slopes that have not been successfully revegetated by past revegetative efforts;
 - 5) culverts and roadfill at drainage crossings will be removed in accordance with the original NOI;
 - 6) newly created slopes adjacent to areas of culvert removal will be regraded to slopes of less than angle of repose to the extent possible;
 - 7) slopes in the vicinity of culvert removal that are 2h:1v or less will be ripped, topsoiled, and revegetated using the appropriate seed mix.

R647-004-112 Variance

1. Kennecott appreciates the Division's approval of its variance request for slope and highwall reclamation, topsoiling, and revegetation for the North BC South and Melco pits and for the un-backfilled portion of the South BC South pit. Kennecott agrees to topsoil and revegetate to the regulatory revegetation standard all safely accessible bench surfaces that are 40 or more feet wide.
2. Kennecott also appreciates the Division's decision to grant a variance from slope regrading and topsoiling the south outslopes of the Melco 7200 and 7300 dumps. Kennecott agrees to a non-binding re-evaluation of the feasibility of regrading the 7200 dump south outslope in the future and will commit to such regrading if the expansion of the Bingham Canyon mine Dry Fork Creek dumps fully intercept the 6850 level of the 7200 dump prior to commencement of reclamation of the outslope at angle of repose.

3. Kennecott proposes to develop, in concurrence with DOGM, an alternate revegetation standard for the angle of repose slopes of the 7200 and 7300 dumps based on results of vegetation transects of revegetated angle of repose fill slopes along the Melco haul road. This standard will be incorporated into the consolidated MRP.
4. Kennecott also appreciates the Division's willingness to grant a partial variance from the revegetation success standard for the road fill and cut slopes. Kennecott understands that instead of a specific numerical revegetation standard for these slopes, a revegetation plan that is more detailed and takes advantage of current reclamation technology will be accepted by DOGM.

R647-064-113 Surety

A new reclamation contract and surety bond has been submitted to the Division on September 16, 1992.

Thank you very much for your cooperation.

Sincerely,



D. I. Hodson
General Manager
Barneys Canyon Mine

cc: W. C. Dodge
D. Z. Skolasinski